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## 20SL-CC03612 - GERALDINE MANN V ARTUR EXPRESS, INC. (E-CASE)

<a href="#">Case Header</a>	<a href="#">Parties &amp; Attorneys</a>	<a href="#">Docket Entries</a>	<a href="#">Charges, Judgments &amp; Sentences</a>	<a href="#">Service Information</a>	<a href="#">Filings Due</a>	<a href="#">Scheduled Hearings &amp; Trials</a>	<a href="#">Civil Judgments</a>	<a href="#">Garnishments/ Execution</a>
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**08/27/2020** ☐ **Corporation Served**

Document ID - 20-SMCC-6773; Served To - ARTUR EXPRESS, INC.; Server - ; Served Date - 14-AUG-20; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

☐ **Notice of Service**

Return of Service.

**Filed By:** CARLA GRACE HOLSTE

**On Behalf Of:** GERALDINE MANN

**08/20/2020** ☐ **Judge/Clerk - Note**

THE PROCESS SERVER FORM FILED ON 07/23/2020 IS SIGNED AND ATTACHED TO THE MOTION FOR SPECIAL PROCESS SERVER ENTRY ON 07/23/2020.

**08/18/2020** ☐ **Note to Clerk eFiling**

**Filed By:** CARLA GRACE HOLSTE

☐ **Correspondence Filed**

Correspondence.

**Filed By:** CARLA GRACE HOLSTE

**On Behalf Of:** GERALDINE MANN

**08/01/2020** ☐ **Summons Issued-Circuit**

Document ID: 20-SMCC-6773, for ARTUR EXPRESS, INC..Summons Attached in PDF Form for Attorney to Retrieve from Secure Case.Net and Process for Service.

**07/23/2020** ☐ **Motion Special Process Server**

Request for Special Process Server.

**Filed By:** CARLA GRACE HOLSTE

**On Behalf Of:** GERALDINE MANN

☐ **Judge/Clerk - Note**

PLEASE SUBMIT THE PROCESS SERVER FORM WITH THE 2ND PAGE OF INSTRUCTIONS

**07/22/2020** ☐ **Request Filed**

Request for Special Process Server.

**Filed By:** CARLA GRACE HOLSTE

**On Behalf Of:** GERALDINE MANN

**07/21/2020** ☐ **Judge/Clerk - Note**

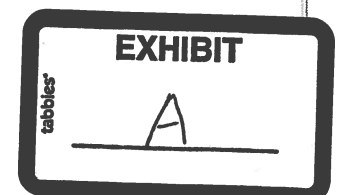
PER LOCAL RULE 28 (E), YOU MUST SUBMIT THE REQUEST FOR PROCESS SERVER FORM WHICH MAY BE FOUND ON THE ST LOUIS COUNYT COURT'S WEB SITE

**07/20/2020** ☐ **Proposed Order Filed**

Order Appointing Special Process Server.

**Filed By:** CARLA GRACE HOLSTE

☐ **Motion Special Process Server**



Motion for Appointment of Special Process Server.

**Filed By:** CARLA GRACE HOLSTE

**On Behalf Of:** GERALDINE MANN

**07/15/2020** ☐ **Judge/Clerk - Note**

NO SUMMONS ISSUED DUE TO MISSING SERVICE FEES OR SPECCIAL PROCESS SERVER FORM. SERICE FEE = \$36.00 PER DEFENDANT WITH A ST. LOUIS COUNTY ADDRESS. PLEASE E-FILE A SERVICE MEMO WITH THE MISSING SERVICE FEES ATTACHED.

**07/09/2020** ☐ **Filing Info Sheet eFiling**

**Filed By:** CARLA GRACE HOLSTE

☐ **Pet Filed in Circuit Ct**

Complaint.

**On Behalf Of:** GERALDINE MANN

☐ **Judge Assigned**

DIV 7

Barbie  
Traylor

1:09



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MARY ELIZABETH OTT	Case Number: 20SL-CC03612
Plaintiff/Petitioner: GERALDINE MANN	Plaintiff's/Petitioner's Attorney/Address CARLA GRACE HOLSTE 515 E HIGH STREET P O BOX 28 JEFFERSON CITY, MO 65102-0028
Defendant/Respondent: ARTUR EXPRESS, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: ARTUR EXPRESS, INC.

Alias:

R/A: ARTUR WAGRODZKI  
4828 PARK 370 BLVD  
HAZELWOOD, MO 63042

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**SPECIAL NEEDS:** If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

01-AUG-2020

Date

Further Information:

LG

*Joan P. Lilley*  
Clerk

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Barbie Traylor (name) Manager on Duty (title).

☐ other

Served at 4828 Park 370 Blvd. (address)

in County of St. Louis (County/City of St. Louis), MO, on 8-24-20 (date) at 1:09 pm (time).

CAROLYN DEM...

Notary Public - State of Missouri

Name of Sheriff or Server

Commissioned for St. Louis County

My Commission Expires: November 27, 2020

Commission Number: 18097713

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on 8/24/20 (date)

My commission expires:

Date

Signature of Sheriff or Server

(date)

Notary Public,

**Sheriff's Fees, if applicable**

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ <u>10.00</u>
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	\$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

James W. Gallaher  
Rudolph L. Veit  
Mark A. Ludwig\*  
Carla G. Holste  
Douglas W. Hennon  
Anne E. Kern  
Jason H. Ludwig  
Blake I. Markus  
Gretchen L. Yancey

\* Also licensed in Illinois



PO Box 28  
515 East High St, Suite 401  
Jefferson City, MO 65102  
(573) 636-2177

401 Locust Street  
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(1910-1981)  
Cullen Coil  
(1907-1989)

(573) 636-7119 (fax)  
[www.carsoncoil.com](http://www.carsoncoil.com)

August 18, 2020

St. Louis County Circuit Clerk  
Via Electronic Filing

Re: Geraldine Mann vs. Artur Express, Inc.  
Case No. 20SL-CC03612

Dear Clerk:

We are waiting for the signed version of the Request for Appointment of Process Server in the above cause to effectuate service on the Defendant. What can we do on our end to get this accomplished?

Please let me know. Thank you for your prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carla G. Holste', is written over the typed name. The signature is fluid and cursive.

Carla G. Holste

CGH:aed



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MARY ELIZABETH OTT	Case Number: 20SL-CC03612
Plaintiff/Petitioner: GERALDINE MANN	Plaintiff's/Petitioner's Attorney/Address CARLA GRACE HOLSTE 515 E HIGH STREET P O BOX 28 JEFFERSON CITY, MO 65102-0028
Defendant/Respondent: ARTUR EXPRESS, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: ARTUR EXPRESS, INC.

Alias:

R/A: ARTUR WAGRODZKI  
4828 PARK 370 BLVD  
HAZELWOOD, MO 63042

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

01-AUG-2020

Date

Further Information:  
LG

*Joan P. Delaney*  
Clerk

## Sheriff's or Server's Return

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I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public



THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

**Purpose of Notice**

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

**Your Rights and Obligations in Court Are Not Affected By This Notice**

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

**Alternative Dispute Resolution Procedures**

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the “neutral,” who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

**(1) Advisory Arbitration:** A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator’s decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

**(2) Mediation:** A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

**(3) Early Neutral Evaluation (“ENE”):** A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

**(4) Mini-Trial:** A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

**(5) Summary Jury Trial:** A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

### **Selecting an Alternative Dispute Resolution Procedure and a Neutral**

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 105 South Central Ave., 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73



In the  
**CIRCUIT COURT**  
 Of St. Louis County, Missouri



GERALDINE MANN  
 Plaintiff/Petitioner

July 21, 2020  
 Date

vs.

ARTUR EXPRESS, INC.  
 Defendant/Respondent

20SL-CC03612  
 Case Number

7  
 Division

**REQUEST FOR APPOINTMENT OF PROCESS SERVER**

Comes now Plaintiff, pursuant  
 to Local Rule 28, and at his/her/its own risk requests the appointment of the Circuit Clerk of  
Eastern Missouri Legal, 7777 Bonhomme Avenue, Suite 2250, Clayton, MO 63105-1911 314-775-4948  
 Name of Process Server Address Telephone

Name of Process Server Address or in the Alternative Telephone

Name of Process Server Address or in the Alternative Telephone

Natural person(s) of lawful age to serve the summons and petition in this cause on the below  
 named parties. This appointment as special process server does not include the authorization  
 to carry a concealed weapon in the performance thereof.

**SERVE:**

Artur Express, Inc. (Artur Wagrodzki)  
 Name  
4828 Park 370 Blvd.  
 Address  
Hazelwood, MO 63042  
 City/State/Zip

**SERVE:**

Name  
 Address  
 City/State/Zip

Appointed as requested:  
**JOAN M. GILMER, Circuit Clerk**

By \_\_\_\_\_  
 Deputy Clerk

Date

**SERVE:**

Name  
 Address  
 City/State/Zip

**SERVE:**

Name  
 Address  
 City/State/Zip

*Anna G. Halse*  
 Signature of Attorney/Plaintiff/Petitioner  
35117  
 Bar No.  
P.O. Box 28, JCMO 65102  
 Address  
(573) 636-2177 (573) 636-7119  
 Phone No. Fax No.

#### Local Rule 28. SPECIAL PROCESS SERVERS

(1) Any Judge may appoint a Special Process Server in writing in accordance with the law and at the risk and expense of the requesting party except no special process server shall be appointed to serve a garnishment [except as allowed by Missouri Supreme Court Rule 90.03(a)].

This appointment as Special Process Server does not include the authorization to carry a concealed weapon in the performance thereof.

(2) The Circuit Clerk may appoint a natural person other than the Sheriff to serve process in any cause in accordance with this subsection;

(A) Appointments may list more than one server as alternates.

(B) The appointment of a person other than the Sheriff to serve process shall be made at the risk and expense of the requesting party.

(C) Any person of lawful age, other than the Sheriff, appointed to serve process shall be a natural person and not a corporation or other business association.

(D) No person, other than the Sheriff, shall be appointed to serve any order, writ or other process which requires any levy, seizure, sequestration, garnishment, [except as allowed by Missouri Supreme Court Rule 90.03(a)], or other taking.

(E) Requests for appointment of a person other than the Sheriff to serve process shall be made on a "Request for Appointment of Process Server" electronic form, which may be found on the Court's Web Site, <https://wp.stlcourtscourts.com> > forms.

(F) This appointment as Special Process Server does not include the authorization to carry a concealed weapon in the performance thereof.

#### SERVICE RETURN

Any service by the St. Louis County Sheriff's Office shall be scanned into the courts case management system. Any service by another Sheriff or a Special Process Server or any other person authorized to serve process shall return to the attorney or party who sought service and the attorney shall file the return electronically to the Circuit Clerk.

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI**

GERALDINE MANN

Plaintiff

vs.

ARTUR EXPRESS, INC.

Defendant

Case No. 20SL-CC03612

**ORDER APPOINTING SPECIAL PROCESS SERVER**

Upon the Motion of Plaintiff for an Order appointing a person other than the Sheriff or coroner to serve process on the Defendant and the Court, having examined the motion and being fully advised in the premises;

IT IS ORDERED ON THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2020, that EASTERN MISSOURI LEGAL is appointed as the person to serve process in this cause on the Defendant.

\_\_\_\_\_  
Judge

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI**

GERALDINE MANN	)	
	)	
Plaintiff	)	
	)	
vs.	)	Case No. 20SL-CC03612
	)	
ARTUR EXPRESS, INC.	)	
	)	
Defendant	)	

**MOTION FOR APPOINTMENT OF SPECIAL PROCESS SERVER**

Comes now Plaintiff, by and through her undersigned attorney, and hereby moves this Honorable Court to authorize and appoint as special process server, EASTERN MISSOURI LEGAL. Eastern Missouri legal is not a party to this action, its process servers are competent and over the age of 21 years, and it/they have no interest in and will not benefit from this action to serve the pleadings in this case on Defendant.

**CARSON & COIL, P.C.**

/s/ Carla G. Holste

---

Carla G. Holste #35117  
515 East High Street  
P.O. Box 28  
Jefferson City, MO 65102  
(573) 636-2177  
(573) 636-7119 (fax)  
**ATTORNEYS FOR PLAINTIFF.**

## IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

GERALDINE MANN	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	
ARTUR EXPRESS, INC.	)	
Serve:	)	
Artur Wagrodzki	)	
4824 Park 370 Boulevard	)	
Hazelwood, MO 63042	)	
	)	
Defendant	)	

**COMPLAINT**

COMES NOW Plaintiff, Geraldine Mann, by and through counsel and for her Complaint against Defendant Artur Express, Inc. ("Defendant") states as follows:

**Jurisdiction and Venue**

1. The Court has subject matter jurisdiction over this controversy pursuant to Article V, Section 14(a).
2. Plaintiff is a resident of Polk County, Missouri.
3. Defendant is a corporation duly organized under the laws of the State of Missouri, with its principal offices located in St. Louis County, Missouri.
4. All of the allegations of discrimination and retaliation occurred in St. Louis County, Missouri so venue is proper in St. Louis County.

**Parties**

5. Plaintiff Geraldine Mann ("Plaintiff") applied for employment with Defendant on or about March 1, 2019. On or about March 7, 2019, Defendant informed Plaintiff that it was not hiring her. Plaintiff subsequently learned that a male who was less qualified than Plaintiff was hired for the position for which Plaintiff had applied.

6. Defendant is within the definition of an “employer” within the meaning of 42 U.S.C. §2000e(b).

#### **Administrative Procedures**

7. Plaintiff timely filed a charge of discrimination against Defendant on or about May 20, 2019. The charge of discrimination was dually filed with the United States Equal Employment Opportunity Commission (“EEOC”) and the Missouri Commission on Human Rights (“MCHR”).

8. Plaintiff has, therefore, satisfied all administrative prerequisites to the institution of her Title VII gender discrimination claim.

#### **Facts**

9. Defendant failed to hire Plaintiff for the position of truck driver and, instead, hired a male applicant who had a far worse driving record than Plaintiff.

10. Defendant discriminated against Plaintiff on the basis of her gender by hiring a male applicant who was less qualified than Plaintiff and advising Plaintiff she did not have the right qualifications for the position.

#### **COUNT I – GENDER DISCRIMINATION CLAIM**

11. Plaintiff hereby re-alleges and incorporates by reference the allegations contained in Paragraphs 1 through 10 above.

12. Plaintiff’s gender, female, was the motivating factor in Defendant’s failure to hire Plaintiff, as evidenced by the fact that a less qualified male applicant was hired for the position for which Plaintiff applied.

13. As a result of Defendant’s discriminatory conduct, Plaintiff suffered actual damages including, but not limited to, a loss of income, loss of employment benefits, loss of self-esteem and enjoyment of life, embarrassment, humiliation, emotional distress and mental



anguish.

14. Defendant engaged in the above discriminatory practice with malice or with reckless indifference to the statutorily protected rights of Plaintiff. She is, therefore, entitled to an award of punitive damages in an amount sufficient to punish Defendant and to deter it and other employers from like conduct in the future.

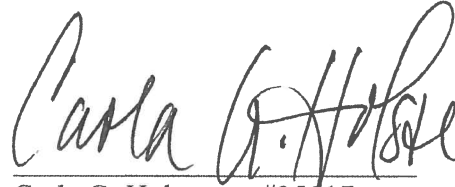
WHEREFORE, Plaintiff prays for the following relief:

- a. That the Court declare that Defendant's conduct complained of herein violates Title VII of the Civil Rights Act of 1964, as amended;
- b. That the Court permanently enjoin Defendant Artur Express, Inc. and its officers, management personnel, employees, agents, attorneys, successors and assigns and those acting in concert therewith from any further conduct violating Plaintiff's rights under Title VII;
- c. That Plaintiff be awarded compensatory damages against Defendant for her lost wages, loss of employment benefits and other suffering;
- d. That Plaintiff be reinstated to her former position, with payment of lost wages and restoration of lost employment benefits;
- e. That Plaintiff be awarded punitive damages against Defendant;
- f. That Plaintiff be awarded her attorney's fees and costs incurred herein;  
and
- g. That Plaintiff be awarded such additional and further relief as the Court deems just and proper.

**Jury Demand**

Plaintiff hereby requests a trial by jury on her Complaint.

**CARSON & COIL, P.C.**

A handwritten signature in black ink, appearing to read "Carla G. Holste", is written over a horizontal line.

Carla G. Holste #35117  
515 East High Street, 4<sup>th</sup> Floor  
P. O. Box 28  
Jefferson City, MO 65102  
(573) 636-2177  
(573) 636-7119 Fax  
cgholste@carsoncoil.com

**ATTORNEYS FOR PLAINTIFF**